

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CENTRAL DIVISION

DENNISSAGEZ, DEAN AND BARB
BUESING, DON AND ELIZABETH
BUESING, DOUGLAS G. FINSTROM,
CHRISTIAN FISHER, FOUR WAY
FARMS, LLC, SUSANGUGE, WALLY AND
JODI HELGET, JR FARMS, INC,
DENNIS AND KAREN KASPARBAUER
TRUST, KASSEL FARMS, INC., GREAT
OAKS FARMS, INC., GEORGIA KASSEL,
JIM KIBBIE, JOHN KIBBIE, PATRICK
KIBBIE, NICK KILL, TODD LUNDGREN,
EDWARD NOONAN, JOSEPH NOONAN,
JACK REICHERT, HAROLD
SCHROEDER, CATHERINE TIESZEN,
CRAIG TIESZEN, ERIC AND
AMY TIESZEN, REED AND MARY
TIESZEN, DEAN AND AMY VERMULM,
PETER VERMULM, WEBER
FAMILY FARM INVESTMENTS, LLC

Plaintiffs,

v.

GLOBAL AGRICULTURAL
INVESTMENTS, LLC, TYLER BRUCH,
BRUCHSIDE, INC, ART A. HALL, ARTAH
HOLDINGS, L.L.C., POPULAR
SECURITIES, INC., BOL, LLC, ALAN
KLUIS, ELIA TASCA,

Defendants.

Case No. 3:11-cv-03059-DEO

**MOTION FOR LEAVE TO AMEND TO
ASSERT COUNTERCLAIMS**

Defendants Tyler Bruch and Bruchside, Inc. hereby move for leave to amend their
Answer to assert Counterclaims against certain Plaintiffs, and in support of their Motion state the
following:

1. The deadline for motions to amend pleadings as set forth in the Scheduling Order is May 2, 2016.

2. On December 23, 2015, these Defendants efiled Counterclaims against certain Plaintiffs, but neglected to contemporaneously file a Motion for Leave to Amend, although the time for amendment of pleadings without leave of Court had passed.

3. This Motion is submitted to cure that failure and to obtain formal leave for the addition of the Counterclaims, which were efiled on December 23.

4. Counsel for the Plaintiffs have indicated that they have no objection to this Motion and will treat the Counterclaims as having been properly filed and served.¹

For the foregoing reasons, Defendants Tyler Bruch and Bruchside, Inc. request that leave be granted for the filing of the Counterclaims and that the Counterclaims be deemed properly filed and served.

Respectfully submitted,

/s/ Steven P. Wandro

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¹ These Defendants have already consented to an extension of time for Plaintiffs to answer the Counterclaims.

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